OCS Joint Study Meeting

1/30/2018

Name	Title/Affiliation	Email
Isaac Chen	EPA	Chen.Isaac@epa.gov
Mitty Mohon	EPA	Mohon.mitty@epa.gov
Sharon Angove	EPA	angove.sharon@epa.gov
Jim Floyd	Chevron	Jim.Floyd@chevron.com
Greg Southworth	OOC	greg@offshoreoperators.com
Richard Wooster	EPA R6	wooster.richard@epa.gov
Rob Lawrence	EPA R6	Lawrence.Rob@epa.gov
Changyong Zhang	ExxonMobil	changyong.zhang@exxonmobil.com
John Candler	MISWACO	jcandler@SLB.com
Ray Arnold	Chevron	rayarnold@chevron.com
Lauren Kristofco	Chevron	LKristofco@Chevron.com
Dennis McDaniel	Anadarko	dennis.mcdaniel@anadarko.com
Bill Wood	Chevron	bill.wood@chevron.com
Maria Olpala	EPA	Olpala.maria@epa.gov
[ON PHONE]		
Region 4 - Jamie S. & Bridget		
EPA HQ - Scott Wilson		
EPA R6 - Brent Larsen		
Silvia Bogdan	~~EPA~~ R6	bogdan.silvia@epa.gov

OOC MEETING WITH EPA REGION 6 & 4

TCW JIP

MEETING AGENDA

JANUARY 30, 2018 (10:00 AM-2:00 PM)

I. Introductions

II. Meeting Purpose and Overview

III. TCW Presentation

IV. Discussion/Clarification on Questions submitted to EPA below:

- **a.** Problem Statement: Clarification from EPA on goal of TCW Study
  - **i.** Are you looking to determine if TCW is a hazard to the environment?
  - **ii.** Is this a gap to update the Effluent Limitation Guidelines (1993)?
  - **iii.** Will final report be placed on EPA website similar to PW/WBM Study?
  - **iv.** Process Frequency-check in with EPA to review draft plans. Who are the points of contact (Region 6 or Region 4) and Toxicologists?
    - a. What resources can EPA offer to help with the JIP (e.g. a list of operators that have discharged TCW over the past 2 years)?
  - **v.** Testing Methodology can vary based on fluids. EPA and OOC to discuss testing.
  - **vi.** Sample representation of the total number of discharges, what % (30-50?) of TCW discharges is EPA looking as statistically sufficient.
  - **vii.** Company participation, if companies sign on to the study are others allowed to sign on after the study is completed or before it ends?

V. Questions and Answers

Note: We will break for lunch at 11:30-12:30

/ SGAL

Characteristic Assessments

Operators must conduct well treatment fluids, well completion fluids, and workover fluids assessments whenever they apply those fluids. Such assessments shall be conducted for each applicable well by operators either corporately or individually. The general information of a specific well treatment, well completion or workover fluid could be used for assessment purposes. Each fluid assessment shall include the following information:

1) Lease and block number
2) API well number
3) Type of well treatment or workover operation conducted
4) Date of discharge
5) Time discharge commenced
6) Duration of discharge
7) Volume of well treatment
8) Volume of completion or workover fluids used
9) The common names and chemical parameters for all additives to the fluids
10) The volume of each additive
11) Concentration of all additives in the well treatment
12) Concentration of all additives in the completion, or workover fluid
13) The No Observable Effect Concentration (NOEC) of 48-hour acute Whole Effluent Toxicity (WET) test, or other appropriate toxicity test, for well treatment fluids discharged separately from the produced water discharge.

Operators shall use the following methods to perform the 48-hour Acute Whole Effluent Toxicity Test Method:

a) The permittee shall utilize the Mysidopsis bahia (Mysid shrimp) acute static renewal 48-hour definitive toxicity test using EPA-821-R-02-012. A minimum of five (5) replicates with eight (8) organisms per replicate must be used in the control and in each effluent dilution of this test.

b) The permittee shall utilize the Menidia beryllina (Inland Silverside minnow) acute static renewal 48-hour definitive toxicity test using EPA-821-R-02-012. A minimum of five (5) replicates with eight (8) organisms per replicate must be used in the control and in each effluent dilution of this test.

c) The NOEC is defined as the greatest effluent dilution which does not result in lethality that is statistically different from the control (0% effluent) at the 95% confidence level.

Industry-Wide Study Alternative: Alternatively, operators who discharge well treatment completion and/or workover fluids may participate in an EPA-approved industry-wide

study as an alternative to conducting monitoring of the fluids characteristic and reporting information on the associated operations. That study would, at a minimum, provide a characterization of well treatment, completion, and workover fluids used in a representative number of wells discharging well treatment, completion, and/or workover fluids. In addition, an approved industry-wide study would be expected to provide greater detail on the characteristics of the resulting discharges, including their chemical composition and the variability of the chemical composition and toxicity. The study area should include a statistical valid number of samples of wells located in the Western and Central Areas of the GOM and may include the Eastern Gulf of Mexico (GOM) under the permitting jurisdiction of EPA Region 4, and operators may join the study after the start date. The study plan should also include interim dates/milestones.

Approval by 3/31/19

A plan for an industry–wide study plan would be required to be submitted to EPA for approval within eighteen (18) months after the effective date of this permit. If the Region approves an equivalent industry-wide well treatment fluids discharge monitoring study, the monitoring conducted under that study shall constitute compliance with these monitoring requirements for permittees who participate in such the industry-wide study. Once approved, the study plan will become an enforceable part of this permit. The study must commence within six months of EPA's approval. The final study report must be submitted no later than October 1, 2021.

Study starts before 10/1/19

Individual Assessment Report: If the Region does not approve the industry-wide study plan or if a permittee does not participate in the industry-wide study, operators shall submit assessment results available according to the following schedules

Due Date	Assessment Period
March 30, 2019	Effective date of the permit through 2018
March 30, 2020	2019
March 30, 2021	2020
October 1, 2021	2021 (Assessment requirements end July 31, 2021.)

The operator shall submit the assessment in pdf format to EPA at the address of

U.S. Environmental Protection Agency Region 6
Water Enforcement Branch (6EN-WC)
Attn: Offshore Specialist
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

STRUCTURE TYPES / LIMIT SETS

as of 02/07/2018
for the

OCS General Permit (GMG290000)
Federal Register / Vol. 82, No. 189/Monday, October 2, 2017 / Notices

Structure Types:

- Platform
- MODU (Mobile Offshore Drilling Unit)
- Subsea

Limit Sets: *

Limit Set Designator:	Limit Set Description:
CT	Chemically Treated Waters
CW	Cooling Water Intake Structure
DC	Drill Cuttings
DD	Deck Drainage
DF	Drilling Fluids
DW	Domestic Waste
HF	Hydrate Control Fluids
MD	Miscellaneous Discharges
PR	Produced Water
SB	SBM Cuttings
SW	Sanitary Waste
WF	Well Fluids
WM	Maintenance BMP

* While none of the Limit Sets are mandatory (as some were under the 2012 OCS General Permit), operators **must select at least one** or the eNOI will not go forward for signature.

Chen, Isaac

From: Wilson, Scott
Sent: Friday, January 16, 2015 12:38 PM
To: Chen, Isaac; Larsen, Brent
Subject: Issues that came out of a conference this week

Brent/Isaac:

I attended the annual Produced Water Society conference this week and a couple of things were mentioned to me that I thought you may want to consider during the next OCS permit reissuance.

The main one was that operators in deepwater are starting to desalinate seawater for use in water flooding. These processes can discharge 2 MGD or more of reject water. While desalination reject water was considered under the OCS general permit and is listed as a miscellaneous discharge, that was as a much smaller waste stream resulting from desalination of seawater for use in drinking and domestic water systems on the platform. These reverse osmosis wastewaters are heavily chemically treated to prevent fouling and to clean the membranes.

The other issues was concerning the groups that are brought in to discuss permit conditions and who receive information regarding draft permits. There seems to be some feeling that the EPA mostly only communicates with the Offshore Operators Committee (OOC) and leaves out other groups such as the International Association of Drilling Contractors and the Independent Producers Association. The issues seems to be that the OOC really is only made up of the Majors and doesn't represent many smaller companies and rig owners. Their point was probably good and it seems to make sense to try to hit a broader audience during the next permit reissuance.

Let me know if you have questions or want any help with these issues when you are working on them.

Scott